

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

JOSEPH WALKER,

Plaintiff,

v.

ORIGINAL

Case No. 20-CV-487

CITY OF MILWAUKEE, et al.,

Defendants.

SPECIAL VERDICT FORM

We, the jury, empaneled and sworn to try the issues in this action, being directed by the court to answer the following questions submitted to us for verdict, find and answer as follows:

CLAIM ONE: EXCESSIVE FORCE

Question No. 1: Has Joseph Walker proven by a preponderance of the evidence that any of the Defendants used unreasonable force against him on April 6, 2014? Please check "yes" or "no" for each name.

ANSWER: (a) Jeremy Gonzalez X YES _____ NO
(b) Balbir Mahay X YES _____ NO
(c) Daniel Clifford X YES _____ NO
(d) Tanya Boll X YES _____ NO

If you answered "yes" to one or more of the defendants listed in Question No. 1, then answer Question No. 2. If you answered "no" to all of the defendants listed in Question No. 1, then proceed to Question No. 9.

COMPENSATORY DAMAGES

Question No. 2: What amount of money will fairly and reasonably compensate Joseph Walker for his injuries resulting from the use of excessive force?

ANSWER: \$ 1,000,000

After answering Question No. 2, proceed to Question No. 3.

PUNITIVE DAMAGES

Question No. 3: Has Joseph Walker proved by a preponderance of the evidence that punitive damages should be assessed against the Defendants? Please check "yes" or "no" for each name.

ANSWER: (a) Jeremy Gonzalez _____ YES X NO
(b) Balbir Mahay _____ YES X NO
(c) Daniel Clifford _____ YES X NO
(d) Tanya Boll _____ YES X NO

If you answered "yes" to one or more of the defendants listed in Question No. 3, then answer Question No. 4. If you answered "no" to all of the defendants listed in Question No. 3, then proceed to Question No. 5.

Question No. 4: What amount of money, if any, do you assess as punitive damages against the individual defendant officers in Question No. 3 above?:

ANSWER: \$ _____

Proceed to Question No. 5.

CLAIM TWO: FAILURE TO INTERVENE

Question No. 5: Has Joseph Walker proved by a preponderance of the evidence that any of the following Defendants failed to intervene to prevent the use of excessive force against him? Please check "yes" or "no" for each name.

ANSWER: (a) Jeremy Gonzalez X YES _____ NO
(b) Balbir Mahay _____ X YES _____ NO
(c) Daniel Clifford _____ X YES _____ NO
(d) Tanya Boll _____ X YES _____ NO
(e) Lisa Purcelli _____ X YES _____ NO

If you answered "yes" to one or more of the defendants listed in Question No. 5, then answer Question No. 6. If you answered "no" to all of the defendants listed in Question No. 5, then proceed to Question No. 9.

COMPENSATORY DAMAGES

Question No. 6: What amount of money will fairly and reasonably compensate Joseph Walker for his injuries resulting from the failure to intervene?

ANSWER: \$ 1,000,000

After answering Question No. 6, proceed to Question No. 7.

PUNITIVE DAMAGES

Question No. 7: Has Joseph Walker proved by a preponderance of the evidence that punitive damages should be assessed against the Defendants? Please check "yes" or "no" for each name.

ANSWER: (a) Jeremy Gonzalez _____ YES X NO
(b) Balbir Mahay _____ YES X NO
(c) Daniel Clifford _____ YES X NO
(d) Tanya Boll _____ YES X NO
(e) Lisa Purcelli _____ YES X NO

If you answered "yes" to one or more of the defendants listed in Question No. 7, then answer Question No. 8. If you answered "no" to all of the defendants listed in Question No. 7, then proceed to Question No. 9.

Question No. 8: What amount of money, if any, do you assess as punitive damages against the individual defendant officers in Question No. 7 above?:

ANSWER: \$ _____

Proceed to Question No. 9.

CLAIM THREE: FAILURE TO TRAIN

Question No. 9: Has Joseph Walker shown by a preponderance of the evidence that the City of Milwaukee has a custom of failing to train its officers in interacting with individuals with mental health crises that caused a violation of Joseph Walker's Constitutional rights? Please check "yes" or "no."

ANSWER: _____ YES X NO


If you answered "yes" to Question No. 9, then answer Question No. 10. If you answered "no" to Question No. 9, stop.

COMPENSATORY DAMAGES

Question No. 10: What amount of money will fairly and reasonably compensate Joseph Walker for his injuries resulting from the failure to train?

ANSWER: \$ _____

Please sign and date the final page of this verdict form.



Foreperson

12/1/23
Date